



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

March 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

MOISES SOLIS,
aka "Moises Rafael Solis
Landeros,"
aka "@ssaucy.frenchiez,"

Defendant.

CR 2:23-cr-00097-JAK

I N D I C T M E N T

[18 U.S.C. § 922(a)(1)(A):
Engaging in the Business of
Dealing in Firearms Without a
License; 26 U.S.C. § 5861(d):
Possession of an Unregistered
Firearm; 26 U.S.C. § 5861(i):
Possession of Firearm
Without Serial Number; 18 U.S.C.
§ 924(d)(1) and 28 U.S.C.
§ 2461(c): Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 922(a)(1)(A)]

Beginning on or about June 2, 2022, and continuing to on or
about February 16, 2023, in Los Angeles County, within the Central
District of California, and elsewhere, defendant MOISES SOLIS, also
known as ("aka") "Moises Rafael Solis Landeros," aka
"@ssaucy.frenchiez," not being a licensed importer, manufacturer, or
dealer of firearms, willfully engaged in the business of dealing in

firearms, specifically, the sales of the following firearms, on or about the following dates:

DATE	FIREARM(S)
August 24, 2022	<p>(1) an AR-style, 5.56x45mm caliber, semi-automatic rifle, with unknown manufacturer, with a barrel less than 16 inches in length, namely, approximately 10.375 inches in length, bearing no serial number (commonly referred to as a "ghost gun");</p> <p>(2) an AR-style, .300 BLK caliber, semi-automatic ghost gun rifle, with unknown manufacturer, with a barrel less than 16 inches in length, namely, approximately 7 inches in length, bearing no serial number; and</p> <p>(3) a Ruger, model LCP II, .380 caliber pistol, bearing serial number 380627048.</p>
September 12, 2022	<p>(1) a Masterpiece Arms, 9mm caliber pistol, bearing the serial number F2137, with an attached cylindrical muzzle device; and</p> <p>(2) an unknown caliber ghost gun rifle, with unknown manufacturer, with a barrel less than 16 inches in length, namely, approximately 8.25 inches in length, bearing no serial number.</p>
October 5, 2022	<p>(1) an FN Herstal 5.7x28mm pistol, bearing serial number 386351866;</p> <p>(2) a Pietro Beretta, model M9A3, 9mm caliber pistol, bearing serial number B011012Z; and</p> <p>(3) a black silencer, bearing no serial number.</p>

DATE	FIREARM(S)
October 17, 2022	<p>(1) a 5.56x45mm caliber ghost gun rifle, with unknown manufacturer, with a barrel less than 16 inches in length, namely, approximately 8.875 inches in length, bearing no serial number;</p> <p>(2) a 5.56x45mm caliber ghost gun rifle, with unknown manufacturer, with a barrel less than 16 inches in length, namely, approximately 8.875 inches in length, bearing no serial number;</p> <p>(3) a Smith and Wesson, model 10-5, .38 caliber revolver, bearing serial number 05727;</p> <p>(4) a FN Herstal, model Five-seven, 5.7x28mm caliber pistol, bearing serial number 386408015; and</p> <p>(5) a FN Herstal, model Five-seven, 5.7x28mm caliber pistol, bearing serial number 386227206.</p>
November 15, 2022	<p>(1) an AR-style, .223 caliber ghost gun pistol, with unknown manufacturer, bearing no serial number;</p> <p>(2) an AR-style, Palmetto State Armory, model PA-15, multi-caliber pistol, bearing serial number SCD476337;</p> <p>(3) a Colt, model Government, .38 Super caliber pistol, bearing serial number 38SCC4679;</p> <p>(4) a FN Herstal, model Five-seven, 5.7x28mm caliber pistol, bearing serial number 386285747; and</p> <p>(5) a Colt, model Government, .38 Super caliber pistol, bearing serial number 38SCC4852.</p>

DATE	FIREARM(S)
January 5, 2023	<p>(1) a Zastava, model PAP, 7.62x39mm caliber pistol, bearing serial number ZAPAP1102066;</p> <p>(2) a 5.56x45mm caliber ghost gun rifle, with unknown manufacturer, with a barrel of less than 16 inches in length, namely, approximately 9 inches, bearing no serial number;</p> <p>(3) a 5.56x45mm caliber ghost gun rifle, with unknown manufacturer, with a barrel of less than 16 inches in length, namely, approximately 9 inches, bearing no serial number;</p> <p>(4) an AR-style Aero Precision, model M4E1, 5.56x45mm caliber pistol, bearing serial number M4-0349508;</p> <p>(5) a Sig Sauer, model M17, 9mm caliber pistol, bearing serial number M17-0211;</p> <p>(6) a Kimber, model Micro 380, .380 ACP caliber pistol, bearing serial number P0105748; and</p> <p>(7) a 5.56x45mm caliber ghost gun rifle, with unknown manufacturer, with a barrel less than 16 inches in length, namely, approximately 7.625 inches, bearing no serial number.</p>

COUNTS TWO THROUGH NINE

[26 U.S.C. § 5861(d)]

On or about the following dates, in Los Angeles County, within the Central District of California, defendant MOISES SOLIS, also known as ("aka") "Moises Rafael Solis Landeros," aka "@ssaucy.frenchiez," knowingly possessed the following firearms, each of which defendant SOLIS knew to be a firearm and a short-barreled rifle, as defined in Title 26, United States Code Sections 5845(a)(3) and 5845(c), and each of which had not been registered to defendant SOLIS in the National Firearms Registration and Transfer Record, as required by Chapter 53, Title 26, United States Code:

COUNT	DATE	FIREARM
TWO	August 24, 2022	an AR-style, 5.56x45mm caliber, semi-automatic rifle, with unknown manufacturer, with a barrel less than 16 inches in length, namely, approximately 10.375 inches in length, bearing no serial number (commonly referred to as a "ghost gun")
THREE	August 24, 2022	an AR-style, .300 BLK caliber, semi-automatic ghost gun rifle, with unknown manufacturer, with a barrel less than 16 inches in length, namely, approximately 7 inches in length, bearing no serial number
FOUR	September 12, 2022	an unknown caliber ghost gun rifle, with unknown manufacturer, with a barrel less than 16 inches in length, namely, approximately 8.25 inches in length, bearing no serial number
FIVE	October 17, 2022	a 5.56x45mm caliber ghost gun rifle, with unknown manufacturer, with a barrel less than 16 inches in length, namely, approximately 8.875 inches in length, bearing no serial number
SIX	October 17, 2022	a 5.56x45mm caliber ghost gun rifle, with unknown manufacturer, with a barrel less than 16 inches in length, namely, approximately 8.875 inches in length, bearing no serial number

COUNT	DATE	FIREARM
SEVEN	January 5, 2023	a 5.56x45mm caliber ghost gun rifle, with unknown manufacturer, with a barrel of less than 16 inches in length, namely, approximately 9 inches, bearing no serial number
EIGHT	January 5, 2023	a 5.56x45mm caliber ghost gun rifle, with unknown manufacturer, with a barrel of less than 16 inches in length, namely, approximately 9 inches, bearing no serial number
NINE	January 5, 2023	a 5.56x45mm caliber ghost gun rifle, with unknown manufacturer, with a barrel less than 16 inches in length, namely, approximately 7.625 inches, bearing no serial number

COUNT TEN

[26 U.S.C. § 5861(d)]

Beginning on an unknown date, and continuing through on or about October 5, 2022, in Los Angeles County, within the Central District of California, defendant MOISES SOLIS, also known as ("aka") "Moises Rafael Solis Landeros," aka "@ssaucy.frenchiez," knowingly possessed a firearm, as defined in Title 26, United States Code, Section 5845(a)(7), and Title 18, United States Code, Section 921(a)(25), namely, a firearm silencer, which defendant SOLIS knew to be a firearm silencer, and which had not been registered to defendant SOLIS in the National Firearms Registration and Transfer Record, as required by Title 26, United States Code, Chapter 53.

COUNT ELEVEN

[26 U.S.C. § 5861(i)]

Beginning on an unknown date, and continuing through on or about October 5, 2022, in Los Angeles County, within the Central District of California, defendant MOISES SOLIS, also known as ("aka") "Moises Rafael Solis Landeros," aka "@ssaucy.frenchiez," knowingly possessed a firearm, as defined in Title 26, United States Code, Section 5845(a)(7), and Title 18, United States Code, Section 921(a)(25), namely, a firearm silencer, which defendant SOLIS knew to be a firearm silencer, and which was not identified by a serial number, as required by Title 26, United States Code, Chapter 53.

FORFEITURE ALLEGATION

[18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), in the event of the defendant's conviction of any of the offenses set forth in Counts One through Eleven of this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title, and interest in any firearm or ammunition involved in or used in such offense, including but not limited to the following seized on February 16, 2023:

1. an Aero Precision, model M4E1, AR-style pistol, bearing serial number 0354284;
 2. an Aero Precision, model M4E1, AR-style pistol, bearing serial number 0355985;
 3. a Llama, .45 caliber pistol, bearing serial number A34787;
 4. a Winchester, model 1873, .44rifle, bearing serial number 00037ZR73N;
 5. approximately 50 rounds of 9mm caliber ammunition;
 6. approximately 47 rounds of .44 caliber ammunition;
- and
7. approximately 32 rounds of assorted ammunition.

1 (b) To the extent such property is not available for
2 forfeiture, a sum of money equal to the total value of the property
3 described in subparagraph (a).

4 3. Pursuant to Title 21, United States Code, Section 853(p),
5 as incorporated by Title 28, United States Code, Section 2461(c), the
6 defendant, if so convicted, shall forfeit substitute property, up to
7 the value of the property described in the preceding paragraph if, as
8 the result of any act or omission of the defendant, the property
9 described in the preceding paragraph or any portion thereof

10 (a) cannot be located upon the exercise of due diligence; (b) has
11 been transferred, sold to, or deposited with a third party; (c) has
12 been placed beyond the jurisdiction of the court; (d) has been

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1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

3
4 A TRUE BILL

5
6 /s/
Foreperson

7
8 E. MARTIN ESTRADA
United States Attorney

9
10 MACK E. JENKINS
Assistant United States Attorney
Deputy Chief, Criminal Division

11 

12
13 SCOTT M. GARRINGER
Assistant United States Attorney
Deputy Chief, Criminal Division

14
15 SHAWN J. NELSON
Assistant United States Attorney
Acting Deputy Chief, General
Crimes Section

16
17 DAVID C. LACHMAN
Assistant United States Attorney
General Crimes Section